

**IN THE CHARDON MUNICIPAL
GEAUGA COUNTY, OHIO**

STATE OF OHIO
(GEAUGA COUNTY HUMANE SOCIETY)

Plaintiff,

v.

BIANCA MARCELLINO

Defendant.

* Case No. 18 CRB 664-A
18 CRB 664-B

* Judge Terri L. Stupica

* **EMERGENCY
MOTION TO INTERVENE
AND MOTION DEMANDING
RETURN OF KAREN MARCELLINO'S
PROPERTY**

Now comes Karen Marcellino, by and through her attorney, and hereby requests this Court grant her leave to intervene in this case. She also files this Motion to demand return of her horses, which are currently in possession of the Geauga County Humane Society.

Karen Marcellino purchased the horses and is the titled owner of the horses. This Court has no jurisdiction or authority to order the forfeiture of property which is not owned by Defendant Bianca Marcellino.

Therefore Karen Marcellino requests this Court, 1) order Geauga County Humane Society to immediately turn possession of her two horses to her; 2) grant her request to intervene in this case.



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PROOF OF SERVICE

The undersigned certifies that a true and accurate copy of the Motion has been sent on March 1, 2019, by email to Gregory Sasse at gregory.sasse@gmail.com and Jeffrey Holland at jjholland@hmlawohio.com



MICHELA HUTH (Reg. No. 0091353)